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Plaintiffs' Co-Lead Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC., CONSUMER
PRIVACY USER PROFILE LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Case No. 18-md-02843-VC-JSC

**DECLARATION OF ANNE K. DAVIS IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL
JOINT LETTER BRIEF RE: CUSTODIANS**

I, Anne K. Davis, declare and state as follows:

1. I am an attorney licensed in the State of California and admitted to the United States District Court for the Northern District of California. I am an attorney at Bleichmar Fonti & Auld LLP (“BFA”), Co-Lead Counsel for Plaintiffs in *In re Facebook, Inc. Consumer Privacy User Profile Litigation*, Case No. 18-md-02843-VC (the “MDL”), and a member in good standing of the bar of the State of California and of this Court.

2. This declaration is made in support of Plaintiffs’ Administrative Motion to File under Seal.

3. Attached hereto as Exhibit 1 is parties’ Joint Discovery Letter in unredacted form. The portions of the document sought to be sealed have been highlighted.

4. Attached hereto as Exhibit 2 is the Joint Discovery Letter in redacted form.

5. Plaintiffs seek to seal the following portions of the Joint Discovery Letter because the information contained in this paragraph was designated as “Confidential” by Facebook:

- a. Limited portions of the paragraphs in Section I.B., discussing Justin Osofsky, Chamath Palihapitiya and Javier Olivan, Sam Lessin, Andrew Bosworth, Antonia Garcia-Martinez, and Mustafa Khan.
- b. Limited portions of the paragraphs in Section II.B, discussing Mustafa Khan.
- c. The quotation, in Section III, Plaintiffs’ Reply, to the document Bates Numbered FB-CA-MDL-00405239.
- d. The two pages comprising Exhibit B, Bates Numbered FB-CA-MDL-00177962 and 0177965, to the Joint Letter Brief (cited in Plaintiffs’ Reply).
- e. Limited portions of the paragraph discussing Khan on page 19.

6. I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct and to the best of my knowledge. This declaration was executed in Oakland, California.

DATED: May 14, 2020

/s/ Anne K. Davis
Anne K. Davis